

Exhibit F

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[Full Listing on Signature Page]

Counsel for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
corporation;

Defendant.

Case No. 3:23-cv-03417-VC

**DEFENDANT META PLATFORMS, INC.'S
AMENDED RESPONSES AND OBJECTIONS
TO PLAINTIFFS' SECOND SET OF
INTERROGATORIES**

Trial Date:
Date Action Filed: July 7, 2023

1 and undue burden and expense. Meta further objects to Instruction 11 to the extent that it purports
2 to require Meta to investigate information outside of its possession, custody, or control. As such
3 the Instruction is overly broad, as well. Subject to any objections applicable to a particular
4 Interrogatory, Meta will conduct a reasonable, proportionate search for non-privileged, relevant,
5 responsive information within its possession, custody, or control.

6 **19.** In responding to all Interrogatories, Meta will comply with the requirements of the
7 Federal Rules of Evidence and Federal Rule of Civil Procedure 26.

8 **III. OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES**

9 **INTERROGATORY NO. 17:**

10 If You or any of Your employees and/or agents intend to assert the advice of counsel
11 defense, state any and all facts upon which You or any of your employees and/or agents intend to
12 rely on for that contention.

13 **AMENDED RESPONSE TO INTERROGATORY NO. 17:**

14 Meta incorporates by reference its objections and definitions above.

15 Meta objects to this Interrogatory as vague and ambiguous as to the reference to “Your
16 employees and/or agents” with respect to any defense in this case, as no Meta employees or agents
17 are parties to this case.

18 Meta objects to this Interrogatory because it exceeds Plaintiffs’ limit of 25 Interrogatories
19 under Rule 33(a)(1).

20 Subject to and without waiving the foregoing objections, Meta responds as follows: As Meta
21 witnesses have testified, Meta had a review process for datasets used to train the Meta Language
22 Models (as construed above) that included, as one component, a legal review. However, Meta does
23 not intend to assert the advice of counsel defense in this case.

1 Dated: November 19, 2024

COOLEY LLP

2 By: /s/ Judd Lauter

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